

UNITED STATES DISTRICT COURT  
for the  
Southern District of Illinois

**FILED**

JUL 22 2011

Teresa Watson  
Plaintiff(s)  
Kim Haywood President  
General Service Employees Local 382  
Defendant(s)  
East Saint Louis School District 189.

Case Number: 11-CV-632-MUR-SCH  
(To be supplied by Clerk's Office)

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST. LOUIS OFFICE

**EMPLOYMENT  
DISCRIMINATION COMPLAINT**

Plaintiff brings a complaint against Kim Haywood President General Service  
[defendant(s)] for discrimination as set forth below. Employees Local 382.  
East Saint Louis School District 189.

Plaintiff  DOES  DOES NOT demand a jury trial.

**I. PARTIES**

Name and Address of Plaintiff:

Teresa Watson  
P.O. Box 24293  
Belleville, IL 62223

Name and Address of Defendant(s):

Kim Haywood  
President  
General Service Employees  
Local 382  
P.O. Box 6407  
East Saint Louis, IL 62201.

East Saint Louis  
School District 189  
1005 State Street  
East Saint Louis, IL  
62201.

### III. STATEMENT OF LEGAL CLAIM

Plaintiff is entitled to relief in this action because: My job was wrongfully taken from me.

- I began asking for assistance of General Service Local 382 in my subsection to sexual harassment in the workplace and actions on the part of my employer that were discriminatory based on my race, religion, and disability (hurt hand and foot at work). I asked for help several times by phone and certified mail and was ignored. I've been discriminated against based on my race, religion, sexually harassed and subjected to retaliation (Title VII of the Civil Rights Act of 1964 as amended.)
- My last supervisor was Donna Cameron. I was placed on involuntary leaves twice, my transfer requests were denied, I was discriminated against based on my race, religion - and was sexually harassed and retaliated against (Title VII of the Civil Rights Act of 1964 as amended.)

### IV. FACTS IN SUPPORT OF CLAIM

State here briefly and clearly as possible the essential facts of your claim. Take time to organize your statement. You may use numbered paragraphs if you find it helpful. Describe precisely how each defendant in this action is involved. Give dates and places. Concentrate on describing as clearly and simply as possible the employment practice you allege to be illegal and how it discriminated against you. It is not necessary to make legal arguments or cite any cases or statutes. In most circumstances, this only makes your claim difficult to understand. As much as possible, let the facts speak for themselves.

See above. (Also because I would not continue submitting to the abusive request my job was taken from me.)

## V. RELIEF YOU REQUEST

Based on the foregoing, Plaintiff seeks the following relief: (check below what you want the court to do for you – make as many checks as you like, and use additional sheets, if necessary).

- An award of back pay
- Reinstatement to Plaintiff's old position
- Costs of suit (but not attorney fees)
- An award of money damages
- Other (explain below)

Any and all awards to make me whole that will be just and proper and ordered by the court(s).

Signed on: 7-22-11  
(date)

P.O. Box 24293  
Street Address  
Belleville, IL 62223  
City, State, Zip

Teresa Watson  
Signature of Petitioner

Teresa Watson  
Printed Name

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Signature of Attorney (if any)